

UNITED STATES OF AMERICA
FEDERAL DEFENDER OFFICE
V
JUAN CONCEPCION

DK # 1:04 CR 10049 WGY

DEFENDANT'S MOTION TO WITHDRAW AND
APPOINT ATTORNEY FOR JUAN CONCEPCION

IN SUPPORT OF THE MOTION THE DEFENDANT
STATES THE FOLLOWING:

1. defendant's in custody since Feb. 24 2004.
2. defendant's sentencing was conducted on Oct. 28 2004.
3. defendant comes back on appeal under Booker, and receives the same sentence he received on Oct. 28 2004. "262" mo.
4. The defendant's claims trial counsel was ineffective.
5. defendant believes there are other issues that trial counsel did not fully take into account.
6. defendant believes new counsel would and will take a different course of action.

Due to the above mentioned reasons, defendant motion ought to be granted.

FEB. 23. 2006

7. defendant requests that he be defendant "pro se"
able to stay in this region Juan Concepcion
while awaiting an answer P.O. Box 807
from the court. MIDDLETON, MA 01949

Juan Concepcion